



**{In Archive} RE: Illinois EPA 2012/2013 PPA CAFO language**

**Yurdin, Bruce** to: Julianne Socha

08/30/2011 04:45 PM

Cc: Bob Newport, "Heacock, Dan", Dennis Wychocki, Diane Nelson,  
Kevin Pierard, Mike Lin, "Sofat, Sanjay"

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There may be several thousand facilities for which all we know is that someone thought something appeared to be livestock structures on an aerial photo. However, to the extent that we can, we will attempt to reconcile the data gaps by 9/30/13, the end of the PPA period.

bjy

-----Original Message-----

From: Socha.Julianne@epamail.epa.gov [  
mailto:Socha.Julianne@epamail.epa.gov]  
Sent: Tuesday, August 30, 2011 3:43 PM  
To: Yurdin, Bruce  
Cc: Newport.Bob@epamail.epa.gov; Heacock, Dan;  
Wychocki.Dennis@epamail.epa.gov;  
Nelson.Diane@epamail.epa.gov;  
Pierard.Kevin@epamail.epa.gov;  
Lin.Mike@epamail.epa.gov; Sofat, Sanjay  
Subject: RE: Illinois EPA 2012/2013 PPA CAFO language

Bruce,  
EPA understands there may be data gaps but we still need a commitment to fill those gaps. If IEPA doesn't believe the data gaps can be filled by the Dec 1, 2011 inventory submittal then the PPA should include a date by which the data gaps will be filled or a schedule for filling the data gaps.  
julianne

From: "Yurdin, Bruce"  
<Bruce.Yurdin@Illinois.gov>  
To: Julianne Socha/R5/USEPA/US@EPA  
Cc: Bob Newport/R5/USEPA/US@EPA, "Heacock, Dan"  
<Dan.Heacock@Illinois.gov>, Dennis  
Wychocki/R5/USEPA/US@EPA,  
Diane Nelson/R5/USEPA/US@EPA, Kevin  
Pierard/R5/USEPA/US@EPA,  
Mike Lin/R5/USEPA/US@EPA, "Sofat, Sanjay"  
<Sanjay.Sofat@Illinois.gov>  
Date: 08/30/2011 01:34 PM  
Subject: RE: Illinois EPA 2012/2013 PPA  
CAFO language

Here's what we know:

LMFA	76
1-299 Animal Units	
LMFA	174
300-999 Animal Units	
LMFA	195
>1000 Animal Units	
IDPH	852
Inspected dairies	

Some of the LMFA facilities and the IDPH dairies will be the same facilities--some but probably not too many. We intend to inquire of IDPH if they have data on herd size or milk production (from which we may deduce the herd size).

But that is not all the inventory contains, which leads us to what we do not know. The inventory is a mapping tool developed by WIU and populated from the above sources plus aerial photograph interpretation of potential CAFO structures. Of these there are many (TNTC). There is no readily available way to sort through these so we intend to do so as resources allow.

Given what we know, we can provide you with a great deal of data on large CAFOs from the LMFA and IDPH datasets by 12/1/11. Working on what we do not know (the WIU aerial photo dataset) will take much longer but will be done over time via field inspections. The WIU data may contain only Lat/Long information while the IDPH has name and address; the LMFA data are complete. That is why we added "where available" so as to indicate that the WIU and IDPH data are currently incomplete.

Hope this helps.  
bjy

-----Original Message-----

From: Socha.Julianne@epamail.epa.gov [mailto:Socha.Julianne@epamail.epa.gov]  
Sent: Tuesday, August 30, 2011 11:47 AM  
To: Yurdin, Bruce  
Cc: Newport.Bob@epamail.epa.gov; Heacock, Dan; Wychocki.Dennis@epamail.epa.gov; Nelson.Diane@epamail.epa.gov; Pierard.Kevin@epamail.epa.gov; Lin.Mike@epamail.epa.gov; Sofat, Sanjay  
Subject: RE: Illinois EPA 2012/2013 PPA CAFO language

Bruce,  
EPA could agree to your suggested language change if  
IEPA includes a  
commitment to fill the data gaps by a date certain.

When you and I talked last Friday, you indicated that  
this information  
for facilities identified through Dept of Health and  
Dept of Ag  
inventories was available or could be derived from  
available information  
and could be included in the Dec 1 2011 inventory.

Julianne

From: "Yurdin, Bruce"  
<Bruce.Yurdin@Illinois.gov>  
To: Julianne  
Socha/R5/USEPA/US@EPA  
Cc: Bob  
Newport/R5/USEPA/US@EPA, Kevin  
Pierard/R5/USEPA/US@EPA,  
"Heacock, Dan"  
<Dan.Heacock@Illinois.gov>, Dennis  
Wychocki/R5/USEPA/US@EPA, Diane  
Nelson/R5/USEPA/US@EPA,  
"Sofat, Sanjay"  
<Sanjay.Sofat@Illinois.gov>, Mike  
Lin/R5/USEPA/US@EPA  
Date: 08/30/2011 10:49 AM  
Subject: RE: Illinois EPA  
2012/2013 PPA CAFO language

While we generally agree with the revised text, the  
content of the  
data we are using for the inventory varies widely.  
Some dataset we  
used contain all the information you listed (name,  
location, type, and  
numbers) but other sources do not. While we intend  
to fill in the  
data gaps, the process of doing so will take time  
and in the end may  
require us to do so via field inspections. We  
would therefore suggest  
the following change to the

CAFO Inventory  
By December 1, 2011, Illinois EPA will provide an  
inventory of large  
CAFOs to EPA. The inventory should identify where  
available facility  
name and location, owner/operator contact  
information, types and

numbers of animals.

bjy

-----Original Message-----

From: Socha.Julianne@epamail.epa.gov [mailto:Socha.Julianne@epamail.epa.gov]  
Sent: Monday, August 29, 2011 5:03 PM  
To: Nelson.Diane@epamail.epa.gov;  
Wychocki.Dennis@epamail.epa.gov;  
Heacock, Dan; Yurdin, Bruce  
Cc: Lin.Mike@epamail.epa.gov;  
Newport.Bob@epamail.epa.gov;  
Pierard.Kevin@epamail.epa.gov  
Subject: Illinois EPA 2012/2013 PPA CAFO language

In response to EPA's 8-25-11 comments to IEPA (Diane Nelson email to Rick Coffman) Bruce Yurdin and Dan Heacock contacted me to discuss EPA's comments regarding the CAFO inventory and Quarterly CAFO permit updates.

The attached includes language that Bruce and I agreed to regarding the CAFO inventory.

Also, as indicated in the attached, the requirement for quarterly CAFO permit updates no longer needs to be included in the 2012/2013 PPA.

The attachment includes all the changes/edits needed to the 8-8-11 version of the PPA language as it relates to NPDES CAFOs. These changes/edits are consistent with EPA's 8-25-11 comments and discussions between Bruce Yurdin and myself on August 26, 2011 and Dan Heacock and myself on August 29, 2011.

If anyone has questions please feel free to contact me.

Julianne Socha  
NPDES Permits Branch  
Water Division, US EPA, Region 5  
312-886-4436  
socha,julianne@epa.gov

(See attached file: 8-29-11 500pm cafo ppa language.docx)